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Counsel for Lead Plaintiff Yun Wang

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ALI KARIMI, Individually and on
behalf of all others similarly situated,

Plaintiff,

v.

DEUTSCHE BANK
AKTIENGESELLSCHAFT, JOHN
CRYAN, CHRISTIAN SEWING, and
JAMES VON MOLTKE,

Defendants.

Case No. 1:20-cv-08978-ES-MAH

**DECLARATION OF
TERRENCE W. SCUDIERI, JR.
IN SUPPORT OF THE
APPLICATION OF VILLI A.
SHTEYN FOR AN ORDER OF
ADMISSION *PRO HAC VICE***

I, TERRENCE W. SCUDIERI, JR., an individual over the age of 18, hereby declare as follows under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am an attorney duly licensed and admitted to appear in and before, and a member in good standing at the bars of this Court, all the courts of the States of New Jersey and New York, and the U.S. Court of International Trade.

2. I am an associate of the law firm of Pomerantz LLP, of New York, New York, Court-appointed Lead Counsel for Lead Plaintiff Yun Wang in the above-captioned matter.

3. I submit this declaration in support of the application for the admission *pro hac vice* of Villi A. Shteyn, of Pomerantz LLP for the purpose of appearing and participating on behalf of the Lead Plaintiff and the proposed Class pursuant to Local Civil Rule 101.1(c).

4. I have personal knowledge of all of the matters set forth herein in my capacity as Mr. Shteyn's colleague and as an attorney for the Lead Plaintiff.

5. If called upon by the Court to testify as to any matter set forth herein, I could and I would do so competently and without any hesitation or reservation.

6. Defendants' counsel has consented to the admission *pro hac vice* of Villi A. Shteyn.

7. Mr. Shteyn has advised me that he is an attorney duly licensed and admitted to the practice of law, and a member in good standing at the bars of, the State of New York, the United States District Courts for the Southern and Eastern Districts of New York, and the United States Court of Appeals for the Second Circuit.

8. Mr. Shteyn has advised me that he is not under suspension, and that he has never been suspended or disbarred from any court.

9. Mr. Shteyn has advised me that he is fully familiar with the facts of this case.

10. There is good cause for the *pro hac vice* admission of Mr. Shteyn, as he is familiar with the facts, issues, and pleadings in this action, and no delay in the conduct of the proceedings would be occasioned by his appearing and participating in this action on behalf of the Lead Plaintiff and the proposed Class.

11. Pursuant to Local Civil Rule 101.1(c)(4), I understand that all pleadings, briefs, stipulations, and other papers filed with the Court shall be signed by me or for me or another attorney affiliated with Pomerantz LLP who is a member in good standing at the bars of the State of New Jersey and of this Court.

12. Further, I, or another attorney affiliated with Pomerantz LLP who is a member in good standing at the bars of the State of New Jersey and of this Court will be present for all appearances before this Court unless previously excused from appearing by the Court.

13. I am aware of my obligations to ensure Mr. Shteyn's continued compliance with Local Civil Rule 101.1(c).

14. Accordingly, I respectfully request that this Court enter an Order admitting Villi A. Shteyn *pro hac vice* in this matter pursuant to and in accordance with Local Civil Rule 101.1(c).

* * *

I declare under penalty of perjury that the foregoing statements made by me are true and correct on this 24th day of May 2021 at New York, New York. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: May 24, 2021
New York, New York

Terrence W. Scudieri, Jr.